



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MGD/PJC
F. #2020R00105

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 18, 2023

By Email and ECF

Maksim Nemtsev, Esq.
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20 Park Plaza, Suite 1000
Boston, MA 02116

Re: United States v. Gorgi Naumovski,
Criminal Docket No. 20-384 (WFK)

Dear Counsel:

Under cover of this letter the government is producing a set of materials (the "Production") containing the items below:

(1) Additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure, including materials received from the Centers for Medicare and Medicaid Services as well as various voice messages, bearing Bates numbers DOJ_GN_055196 through DOJ_GN_055814. The discovery materials are being produced by secure file transfer and are enclosed in a folder entitled "Discovery."

(2) Additional proposed exhibits that the government may introduce at trial, as well as notes of recent witness preparation meetings. The proposed exhibits and notes are being produced by secure file transfer and are enclosed in folders entitled "500 – Summary Charts" and "Agent Notes," respectively.

(3) Materials pertaining to two potential government witnesses. The government does not currently intend to call these witnesses in its case-in-chief; however, the government reserves the right to do so and is producing these materials in an abundance of caution. These materials are being produced in part by secure file transfer, enclosed in a folder called "Other Potential Witness Materials," and in part on two flash drives, which have been sent to your office via Federal Express.

The contents of the Production are designated "confidential" under the terms of the Protective Order that was agreed to and acknowledged by you. The government reserves the right to supplement or modify the proposed exhibits and disclosures.

* * *

The government hereby renews its request for reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely upon at trial, or that were prepared by a witness whom the defendant intends to call at trial.

The government also renews its request that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid unnecessary delays, the government requests that the defendant have copies of those statements available for production to the government no later than the commencement of trial.

The government also renews its request that the defendant provide a signed expert disclosure and written summary of testimony that the defendant intends to use as evidence at trial under Rules 702, 703, and 705 of the Federal Rules of Evidence. See Fed. R. Crim. P. 16(a)(1)(G)(vi).

Very truly yours,

GLENN S. LEON
Chief
Criminal Division, Fraud Section
U.S. Department of Justice

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